

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

SHANTAY HEAVEN, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

PRIME HYDRATION LLC,

Defendant.

Case No. 2:24-cv-04754

Hon. Nitza I. Quiñones Alejandro

**PLAINTIFF'S MOTION TO REMAND AND FOR FEES AND COSTS**

Plaintiff Shantay Heaven, by and through her undersigned counsel, respectfully moves pursuant to 28 U.S.C. § 1447(c) to remand this action to the Court of Common Pleas of Philadelphia County, Pennsylvania, and for an award of her reasonable attorneys' fees and costs incurred as a result of the removal. The bases for Plaintiff's Motion are fully set forth in the contemporaneously filed Memorandum of Law in Support of Her Motion.

Dated: September 19, 2024

Respectfully submitted,

By: /s/ Mark C. Atlee

Mark C. Atlee

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2024, I electronically filed the foregoing document with the Court's CM/ECF system, which will provide e-mail notice to all counsel of record.

**FROST BROWN TODD LLP**

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By: /s/ Mark C. Atlee  
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